



United States Department of the Interior
National Business Center
Aviation Management
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DOI AM OPERATIONAL PROCEDURES MEMORANDUM NO. 06-33

Subject: Aviation Program Evaluations

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1. Purpose. This OPM establishes policy and procedures for the oversight, conduct, tracking and associated management of aviation program evaluations.

2. Authority. The Associate Director, Department of the Interior, Aviation Management (DOI AM), establishes this policy in accordance with provisions of Department Manual 352 DM 1 *Aviation Safety Program*, and Secretarial Order 3250A1, dated July 31, 2004.

The Federal Managers Financial Integrity Act (P.L. 97-255) establishes specific requirements for agency heads to establish management controls safeguarding against waste, fraud and mismanagement. Office of Management and Budget (OMB) Circular A-123 prescribes appropriate management controls as an integral part of the cycle of planning, budget, management and auditing. Federal Management Regulation (41-CFR 102.33) establishes Federal aviation management practices including evaluation, review and reporting on aspects of aviation programs. The Interagency Committee for Aviation Policy (ICAP) agreement of January 2000 establishes common aviation safety standards and guidelines that require program evaluations for all ICAP-member agencies.

3. Introduction. Aviation program evaluations are conducted via a systematic process for analyzing and reporting information with regard to the aviation programs at all levels of the Department of the Interior. It is an essential means of providing feedback related to the operations, process, and outcomes of aviation programs with a focus on program enhancement. This quality assurance system assesses the safety of aviation services provided, ensures efficiency in management of complex resources, and provides a means for sharing best practices.

4. Policy. Bureau managers are responsible for aviation program performance and established standards. Interior's aviation program evaluations will be conducted in each of the bureau's geographic units (region/state) that use aviation resources. Evaluations should occur on a five-year interval and assess processes commensurate with controlling costs, mitigating adverse aspects of aviation operations, and to evaluate outcomes.

Goals- Department level aviation program evaluation goals are that:

- Evaluations will be conducted in a manner that is objective and independent of internal bureau inspections, audits, and controls while minimizing the duplication of efforts.
- Reliable and timely information will be obtained, maintained, reported, and used for decision-making.
- Management and program deficiencies will be recognized and corrective actions will be recommended promptly.
- Findings and recommendations will be monitored for corrective action and bureaus will be encouraged to pursue program enhancements.
- Best practices will be identified and shared with all aviation programs through the evaluation/oversight process.

5. **Responsibility.**

A. **Department of the Interior, Aviation Management (DOI AM).** The Associate Director, DOI AM, shall establish evaluation criteria for and provide leadership in the conduct of aviation program management and aviation safety program evaluations within the Department (352 DM 1.6A). It is the responsibility of the Aviation Program Evaluation Specialist to develop and maintain an independent assessment program commensurate with Departmental policy, goals and objectives.

B. **Bureau.** Bureau Aviation Managers are responsible for coordination with Regional or State Directors and the DOI AM for the conduct of timely program evaluations, facilitating program enhancements, and follow-up.

C. **Managers.** Managers at all levels in DOI AM and the bureaus have the responsibility for implementing prescribed management controls, participating in and/or supporting evaluations of their program, and for leading efforts toward aviation program enhancement.

6. **Evaluation Process.**

A. **Planning.** The following procedure will be followed in conducting and monitoring phases of the aviation program evaluation system.

(1) The Aviation Program Evaluation Specialist will coordinate with the bureau Aviation Manager and the DOI AM Regional Director on team membership and itinerary. Team composition should include the DOI AM Regional Director or their designated representative. The Aviation Program Evaluation Specialist will maintain the final decision on team composition and/or support services as necessary.

(2) DOI AM may fund the team's transportation while in the field. The bureau is responsible for coordinating transportation requirements with the Aviation Program Evaluation Specialist. Team members/advisors are responsible for the cost of their transportation from their home office to the site of the management briefing and their return home.

(3) The Associate Director, DOI AM, will provide initial correspondence for evaluation coordination/scheduling to the bureau Regional Director or State Director in the geographical area where the aviation evaluation will be conducted. A courtesy copy will also be sent to the bureau Director.

B. Program Scope and Outcomes. The Aviation Program Evaluation Specialist will collect data representing the last 5 years' accident/incident occurrence, SAFECOM participation, aircraft use in hours and dollars, and other data found to be relevant to program performance and outcomes. Copies will be sent to evaluation team members and the bureau Aviation Manager prior to the evaluation.

(1) The bureau Aviation Manager is responsible for dissemination of the aviation evaluation criteria to each unit being visited by the team.

(2) The bureau should provide copies of reports from internal evaluations or similar studies for the team to review prior to its field visit. The team may review field unit aviation plans and/or safety plans when available.

C. Conduct. Bureau Regional or State Directors and staff shall be briefed, in person, by telephone, or by e-mail prior to and after completion of the field evaluation. The Aviation Program Evaluation Specialist will brief the DOI AM Associate Director in closing. The team should visit aviation support facilities (helibases, airports, retardant bases, dispatch centers) as time permits, to include cooperating or interagency facilities. General areas of assessment will include the following:

(1) Administration. Quality controls and outcomes may be assessed in the following categories;

(a) Management and Organization: Evaluate the effectiveness of management practices, internal guidance processes, controls, and organization structure.

(b) Needs Assessment: Assess the efficiency and effectiveness of aviation resources being used or immediately available to a program.

(c) Economic Evaluation: Evaluate the cost and outcomes of program expenditures. This may consider cost comparisons among the available procurement alternatives (in-house, contract or rental, relative to the A-76 study).

(d) Customer Satisfaction: Provide feedback about the extent to which the services rendered by DOI AM have met the bureau's expectations.

(2) Operations. Assess whether operations are functioning as intended by management. Evaluate procedures used for compliance with Federal Aviation Regulations (FARs) and Department Manuals (DMs). This may be conducted as a short-term response to safety concerns, as an operational risk assessment, or to review procedural issues of immediate concern.

(3) Safety. Analyze bureau accident prevention activities, accident history, and participation in the DOI Aviation Mishap Information System. Identify trends in the program that may precipitate mishaps.

(4) Training. Determine the level of participation in aviation management and safety training for initial competency and for the maintenance of skills.

(5) Security. Aviation security is considered a key element of each bureau aviation program. In accordance with 352 DM 10, *Aircraft and Aviation Facility Security*, aircraft and aviation facility security will be assessed for compliance in accordance with policies and procedures designed to safeguard DOI owned or controlled aircraft against theft and associated misuse by terrorists or individuals engaging in other criminal activity. *The Field Reference Guide for Aviation Security for Airport or other Aviation Facilities (AAF)* will be utilized for compliance. Available at: <http://www.oas.gov/>.

D. Findings and Recommendations. Findings will be accompanied by recommendations for aviation program enhancement with suggested assignments to bureau or DOI AM offices. The bureau is responsible for facilitating personnel assignments for corrective actions with specific due dates. Team findings and recommendations will be provided in writing to the bureau Aviation Manager. The final report will include worksheets to be completed at the appropriate bureau/DOI AM level for workload assignments and due dates. The final report will be developed by the Aviation Program Evaluation Specialist in coordination with the bureau Aviation Manager and will be forwarded from the DOI AM Associate Director to the bureau Director.

The Aviation Program Evaluation Specialist will coordinate with the bureau Aviation Manager to track recommendations and target dates for follow-up in each geographic area evaluation. The Aviation Program Evaluation Specialist will document enhancements that are accomplished in the Department's aviation programs.

7. Recognizing and Reporting Deficiencies. Commensurate with the requirement of OMB Circular A-123 the Department is required to report material weaknesses in management controls. The DOI Management Control Program prescribes a system for bureaus to identify and report these weaknesses. The DOI AM and bureaus will facilitate the reporting of material weaknesses in aviation management practices commensurate with the direction established in the referenced program.

A. Definitions.

(1) Program deficiency is an issue that may identify any concern related to the safe, effective, and efficient operation of an aviation program such as:

(a) An item which is contrary to the appropriate established requirements of the Departmental Manual (DM), Operational Procedures Memorandums (OPMs), Federal Aviation Regulations (FARs) or interagency agreements.

(b) An item that compromises safety, risk management or accident prevention.

(c) An item that unnecessarily hampers or delays the accomplishment of the assigned mission or causes an unjustified increased cost to the Government.

(d) An item contributing to the waste, fraud, or mismanagement of aviation funds, programs, or resources.

(2) Material weakness is an unresolved program deficiency that:

(a) Is substantially and/or essentially below the standard established by the Department or in the Code of Federal Regulations (CFR).

(b) Has not been corrected within a reasonable amount of time and effort.

(c) Is subsequently designated by the DOI AM Associate Director as a problem significant enough to report outside the agency.

The identification/designation of a material weakness requires a judgment by senior management as to the relative risk and significance of deficiencies to the Department. Reporting outside the agency is only recommended after a reasonable period of time has elapsed and all available resources have been exhausted in the attempt to correct the deficiency.

B. Reporting Deficiencies. Bureau managers and employees should identify deficiencies and enhancements as a result of their operational management controls. Safety deficiencies may also be reported via a safety communiqué (SAFECOM). A program deficiency observed during the course of an aviation program evaluation will generally be reported if it is, or should be, of interest to the next level of management. Less significant and site specific operational concerns may also be reported for the bureau's internal use, but will not require further reporting or tracking.

8. Program Enhancements. Bureau managers are responsible for taking timely and effective action to implement recommended enhancements. One year from the time of notification is considered sufficient time to resolve issues that do not require "out-year" fiscal planning and approval (In comparison, management must make a decision regarding IG audit recommendations within a six-month period and implementation of IG recommendations should be completed within one year to the extent practicable).

A determination should be made when sufficient corrective actions have been taken and desired results have been achieved. The DOI AM Aviation Program Evaluation Specialist will be notified and subsequently document when a program enhancement effort comes to closure.

/s/ Mark L. Bathrick
Associate Director